

1 Jacqueline Perry (State Bar No. 218367)
jperry@rufuslaw.com
2 Neil J. Fraser (State Bar No. 125651)
nfraser@rufuslaw.com
3 RUFUS-ISAACS, ACLAND & GRANTHAM LLP
232 North Canon Drive
4 Beverly Hills, CA 90210
Telephone: (310) 274-3803
5 Facsimile: (310) 860-2430

6 Attorneys for Plaintiff
NATTO IYELA GBARABE

Robert A. Mittelstaedt (State Bar No. 60359)
rmittelstaedt@JonesDay.com
Caroline N. Mitchell (State Bar No. 143124)
cnmitchell@JonesDay.com
David L. Wallach (State Bar No. 233432)
dwallach@JonesDay.com
JONES DAY
555 California Street, 26th Floor
San Francisco, CA 94104
Telephone: 415.626.3939
Facsimile: 415.875.5700

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14 Attorneys for Defendant
CHEVRON CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATTO JYELA GBARABE et al..

Plaintiff,

v.

CHEVRON CORPORATION

Defendant

Case No. 14-cv-00173-SI

JOINT [PROPOSED] CASE MANAGEMENT ORDER

Date: June 2, 2016
Time: 3:00 p.m.
Judge: Hon. Susan Illston
Courtroom: 1

1 The parties have submitted their respective positions on the production of plaintiff's
2 funding agreement and the Court will take it under submission.

3 The parties have stipulated and the Court orders:

4 1. Plaintiff will complete electronic production of the Damage/Loss Questionnaires
5 by May 31, 2016 and will not rely in class certification on any Damage/Loss surveys
6 produced thereafter, absent a showing of good cause for later production and/or lack of
7 prejudice to defendant. If a dispute arises that the parties cannot resolve informally, the
8 issue will be submitted to this Court for determination. Plaintiff will also produce the
9 names of the individuals who collected the Damage/Loss Questionnaires no later than
10 May 31, 2016.

11 2. Plaintiff will produce all facts and data, and any other production required by the
12 March 7 stipulated order (Dkt. No. 120) by May 31, 2016. Plaintiff will certify that his
13 production of facts and data is complete as of that date. To the extent that facts and data
14 are not produced by that date, defendant reserves the right to move to exclude any
15 opinions that rely on unproduced facts and data. Plaintiff reserves the right to argue his
16 position that all necessary "facts and data" have been provided by that date or are outside
17 the scope of Rule 26(a)(2)(B)(ii). In the event there is a dispute as to the completeness of
18 the materials produced by plaintiff, the parties agree to submit the issues for determination
19 to this Court.

20 3. Plaintiff will re-produce his prior document productions with Bates numbers by
21 June 16, 2016. The parties agree to meet and confer over any logistical issue which
22 makes said date untenable.

23 4. Plaintiff will file a "Certification of Interested Entities and Persons" pursuant to
24 Local Rule 3-15 by May 31, 2016.

25 5. The dates for class certification shall be re-set as follows:

26 Class Certification Opposition Brief: September 2, 2016

27 Class Certification Reply Brief: November 4, 2016; and

28 Hearing: December 9, 2019.

1 IT IS SO ORDERED.
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Dated: June 2, 2016
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Hon. Susan Illston
United States District Judge
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